

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

IN RE WATTSTOCK, LLC,

Debtor.

WATTSTOCK, LLC,

Plaintiff,

v.

ALTA POWER LLC,

*Defendant, Counter-Plaintiff,
and Third-Party Plaintiff,*

v.

WATTSTOCK, LLC,

Counter-Defendant, and

GENERAL ELECTRIC

INTERNATIONAL, INC., d/b/a GE

POWER SERVICES,

Third-Party Defendant.

Case No. 3:23-CV-0270-X

**JOINT PROPOSAL FOR CONTENTS
OF SCHEDULING AND DISCOVERY ORDER**

Proposed Date to Complete Discovery	Fact discovery: October 1, 2024 Expert discovery: November 8, 2024
Proposed Trial Date, including the number of trial days and whether a jury has been demanded	Trial Date: April 14, 2025 Number of Trial Days: 14 days Jury demand made
Proposed Motion Deadline	Summary Judgment: November 22, 2024 Challenges to experts—including motions to strike or exclude expert witnesses: December 20, 2024
Proposed Deadline to file motions for leave to join other parties	May 8, 2024

Proposed Deadline to file motions for leave to amend the pleadings	May 8, 2024
Proposed Deadline to Designate Expert Witnesses (including rebuttal experts)	The party with the burden of proof on a claim: August 16, 2024 Rebuttal designation by the party without the burden of proof on a claim: September 13, 2024
Proposed Deadline to commence settlement negotiations	December 20, 2024

1. Status report explaining progress made at the meeting and present status of settlement negotiations: *The parties are willing to explore settlement discussions.*
2. Advisability of referring the case for mediation: *The parties are willing to mediate the dispute and believe the mediation will be most fruitful after summary judgment has been fully briefed, but will defer to the Court regarding a specific referral and/or deadline for mediation.*
3. Do the parties consent to trial (jury or non-jury) before a United States Magistrate Judge? *The parties do not consent to a trial before a United States Magistrate Judge.*
4. Proposed plan and schedule for discovery: *The parties refer the Court to the plan and schedule for discovery in the above chart.*
5. Proposed limitations on discovery, if any: *None at this time other than the presumptive limitations in the Federal and Local Rules.*

6. Other proposals regarding scheduling and discovery that the parties believe will facilitate expeditious and orderly preparation for trial, including the parties' positions on a consolidated discovery schedule: *None at this time.*
7. Are the parties considering mediation or arbitration to resolve this litigation, and if not, why not? *The parties are willing to mediate the dispute and believe the mediation will be most fruitful after summary judgment has been fully briefed, but will defer to the Court regarding a specific referral and/or deadline for mediation.*
8. Other matters relevant to the status and disposition of this case: *The parties are aware of no other matters requiring the Court's attention at this time.*

Dated: April 17, 2024

Respectfully submitted,

/s/ Andrew LeGrand

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CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing document has been served on counsel of record pursuant to the Federal Rules of Civil Procedure.

/s/ Andrew LeGrand

Andrew LeGrand